

## **Housing Delivery Test Measurement Results and Implications for decision making in Greater Cambridge (February 2019)**



On the 19th February 2019 the first set of "Housing Delivery Test" (HDT) results [were published](#). They set out a standard approach to measuring how well the delivery of homes is going by local planning authority, and create a series of consequences on councils for failing the test depending on the extent of any under delivery of housing.

### South Cambridgeshire

The first 2018 HDT measurement result for South Cambridgeshire is 78% with a consequence of 'Buffer'. A note to the measurement document states that where the consequence is 'buffer' the requirement to also prepare an Action Plan also applies, subject to the outcome of correspondence with the Ministry of Housing Communities and Local Government (see below). The recently adopted South Cambridgeshire [Local Plan](#) (September 2018) includes an Appendix A setting out our 5 year housing land supply as established through the examination of the Local Plan which already includes a 20% buffer so the HDT result in regard to 'buffer' has no additional consequence.

A 6 month period is allowed for the preparation of an Action Plan.

### Cambridge City Council

The first 2018 HDT measurement result for Cambridge is 388% with no required consequences.

### Implications for planning decision making

The 2018 HDT has no consequences for how planning applications for the supply of housing will be determined in Cambridge and South Cambridgeshire whether assessed separately or jointly. Paragraph 11(d) of the National Planning Policy Framework ([NPPF](#)) does not currently apply in either district. Paragraph 11(d) sets out the circumstances where policies should be considered to be out-of-date. Footnote 7 says that this includes where the HDT indicates that delivery of housing is substantially below the housing requirement over the previous three years which it defines as 75%. On this basis neither Cambridge nor South Cambridgeshire is subject to paragraph 11(d). Furthermore paragraph 215 of Annex 1 of the NPPF sets out transitional arrangements for the implementation of the NPPF, including the HDT, and is clear that for the first published HDT results (those published in February 2019), the test for when footnote 7 would apply is in circumstances where delivery was below 25% of the housing required over the previous three years.

For all the reasons set out above, the publication of the HDT results has no implications for the determining of planning applications relating to the supply of housing in Greater Cambridge and paragraph 11(c) applies to such cases and not paragraph 11 (d).

### Correspondence with the Ministry of Housing Communities and Local Government (MHCLG)

The Councils have jointly written to MHCLG requesting that Cambridge and South Cambridgeshire be considered jointly for the purposes of the HDT.

The recently adopted Local Plans for Cambridge and South Cambridgeshire both state that *“the housing trajectories for Cambridge and South Cambridgeshire, ..., will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply ...”*.

The Inspectors concluded through the examinations of the recently adopted Local Plans that the five year supply for the two areas should be considered jointly (i.e. for Greater Cambridge as a whole) and recommended that the wording set out above be included in both Local Plans. The key reasoning for concluding this approach is appropriate is that the Councils have a joint development strategy and sequence for development which involves more development in Cambridge initially in the plan period as the edge of Cambridge sites are completed within its administrative boundary, and more development later in the plan period in South Cambridgeshire as the new settlements and edge of Cambridge sites are completed within its administrative boundary.

As the HDT relates to the phasing of housing delivery, the wording included in the Local Plans as set out above provides for the two Councils to be considered together for the purposes of the HDT. The same key reasoning that the Inspectors concluded was appropriate for the joint approach to calculating five year supply equally applies to calculating the HDT jointly.

The MHCLG has therefore been requested to calculate and publish the HDT results for Cambridge and South Cambridgeshire jointly as Greater Cambridge (the 2018 HDT measurement result for Greater Cambridge would be 165%). When a substantive response is received from the MHCLG we will add its conclusions to this statement.